

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS and WILLIAM ZHANG,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and DAN
LARIMER,

Defendants.

Case No. 1:20-cv-02809-LAK

Honorable Lewis A. Kaplan

DECLARATION OF JORDAN A. GOLDSTEIN

I, Jordan A. Goldstein, declare as follows:

1. I am a partner at Selendy & Gay PLLC, counsel for Plaintiffs. I am admitted to the bar of the State of New York and admitted to practice before this Court and am in good standing.

2. I make this declaration in support of Plaintiffs' Reply In Further Support of Their Motion for Appointment of Lead Plaintiffs and Approval of Their Selection of Roche Cyrulnik Freedman LLP and Selendy & Gay PLLC As Co-Lead Counsel.

3. Attached hereto as Exhibit 1 is a true and correct copy of the certificate of formation for Token Fund I LLC, showing that Token Fund I LLC was formed on June 6, 2020 under the laws of Puerto Rico.


4. Attached hereto as Exhibit 2 is a true and correct copy In the Matter of Brandon Elsasser of a June 29, 2017 Order Instituting Proceedings Pursuant to Sections 6(c) and 6(d) of the Commodity Exchange Act, Making Findings and Imposing Remedial Sanctions, CFTC Docket No. 17-18, issued by the Commodity Futures Trading Commission ("CFTC").

5. Attached hereto as Exhibit 3 is a true and correct copy of a CFTC press release dated June 29, 2017, available at <https://www.cftc.gov/PressRoom/PressReleases/7582-17>, titled “CFTC Orders Rosenthal Collins Capital Markets LLC, Now Known as DV Trading LLC, to Pay a Civil Penalty of \$5 Million for Engaging in Illegal Wash Sales Designed to Generate Exchange Rebate Fees[;] Former RCCM Trader Brandon Elsasser also Ordered to Pay \$200,000 for Similar Unlawful Trading Conduct.”

6. Attached hereto as Exhibit 4 is a true and correct copy of a Notice of Disciplinary Action issued by the Chicago Mercantile Exchange and directed at Brandon Elsasser, available at <https://www.cmegroup.com/notices/disciplinary/2017/12/cme-13-9575-bc-2-brandon-elsasser.html>.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 29, 2020
New York, New York


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